

FILED 17 AUG 21 15:58 USDC-GRP

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

SEALED

UNITED STATES OF AMERICA

3:21-cr-295-HZ

v.

INDICTMENT

CHRYSTAL WILLIAMS,

18 U.S.C. § 1028A

18 U.S.C. § 1344

Defendant.

Forfeiture Allegation

UNDER SEAL

THE GRAND JURY CHARGES:

COUNTS 1 - 7  
(Aggravated Identity Theft)  
(18 U.S.C. § 1028A)

On or about the dates set forth below in each Count, in the District of Oregon and elsewhere, defendant CHRYSTAL WILLIAMS, did unlawfully, knowingly, and intentionally possess, and use, without lawful authority, a means of identification of another, knowing that the means of identification belonged to a real person, during and in relation to felony violations of 18 U.S.C. §1344:

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Indictment

Count	Date	Amount	Means of Identification	Felony Violations
1	5/19/2020	\$7,384.40	Account Number belonging to VICTIM 1	18 U.S.C. §1344
2	6/10/2020	\$7,942.43	Account Number belonging to VICTIM 2	18 U.S.C. §1344
3	6/22/2020	\$1,753.91	Account Number belonging to VICTIM 3	18 U.S.C. §1344
4	6/24/2020	\$3,522.00	Account Number belonging to VICTIM 4	18 U.S.C. §1344
5	6/30/2020	\$19,400.00	Account Number belonging to VICTIM 5	18 U.S.C. §1344
6	7/9/2020	\$58,522.35	Account Number belonging to VICTIM 6	18 U.S.C. §1344
7	7/13/2020	\$1,275.00	Account Number belonging to VICTIM 7	18 U.S.C. §1344

In violation of Title 18, United States Code, Section 1028A.

**COUNTS 8 - 14**  
**(Bank Fraud)**  
**(18 U.S.C. § 1344)**

On or about the dates set forth below in each Count, in the District of Oregon and elsewhere, defendant CHRYSTAL WILLIAMS, for purposes of executing and attempting to execute the material scheme and artifice to defraud described in Counts 1 – ~~7~~ of this Indictment and for obtaining money, funds, or property owned or under control of the named financial institution by means of materially false or fraudulent pretenses, representations, or promises knowingly committed the following acts:

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**Indictment**

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Count	Date	Financial Institution	Description of Execution
8	5/19/2020	Comerica Bank account of VICTIM 1	Deposit at Wells Fargo Bank, N.A.
9	6/10/2020	Bank of America account of VICTIM 2	Deposit at Wells Fargo Bank, N.A.
10	6/22/2020	United States Bank account of VICTIM 3	Deposit at Wells Fargo Bank, N.A.
11	6/24/2020	Keybank account of VICTIM 4	Deposit at Wells Fargo Bank, N.A.
12	6/30/2020	Wells Fargo Bank, N.A. account of VICTIM 5	Deposit at Wells Fargo Bank, N.A.
13	7/9/2020	Wells Fargo Bank, N.A. account of VICTIM 6	Deposit at Wells Fargo Bank, N.A.
14	7/13/2020	Wells Fargo Bank, N.A. account of VICTIM 7	Deposit at Wells Fargo Bank, N.A.

In violation of Title 18, United States Code, section 1344.

**FORFEITURE ALLEGATION**

Upon conviction the offenses in Counts 1 – 14, defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations.


Dated: August 17, 2021

A TRUE BILL.

  
OFFICIATING FOREPERSON

Presented by:

SCOTT ERIK ASPHAUG  
Acting United States Attorney

  
ETHAN D. KNIGHT, OSB #992984  
Assistant United States Attorney

Indictment